Western Cooperative
for educational telecommunications

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Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Reply comments in response to the NPRM in ET Docket 94-124, RM 8308 (released November 8, 1994) relating to the use of frequencies above 40 GHz for a Local Millimeter Wave Service

Dear Members of the Commission:

The Western Cooperative for Educational Telecommunications is a program of the Western Interstate Commission for Higher Education (WICHE), an interstate educational compact approved by the U.S. Congress in 1953. The Western Cooperative for Educational Telecommunications is a membership organization whose constituents represent higher education institutions, K-12 educational agencies and service districts, state government, public broadcasting, and telecommunications services providers that are working together to improve education's ability to effectively use technology for instruction. Our 150 members come principally from 15 western states and represent some of the country's leading providers of telecommunications-delivered education..

Last year the Western Cooperative and several of its member institutions nominated Ms. Willi Bokenkamp from the University of California to share the "public interest" designated seat on the LMDS/FSS 28 GHz Band Negotiated Rulemaking Committee in Fall 1994. Even though our educational representation on the committee was limited to one seat, the Western Cooperative and its membership perceived the appointment as an achievement and a recognition by the FCC of the importance of having educational and other public interests involved in discussions of emerging technologies and their applications and allocations.

Our interest in the LMDS/FSS and LMWS deliberations is based on education's increasing reliance on technology as a means of ensuring educational opportunities to the region's growing student population. Contributing to this growth are demands for continuing education, professional development, and retraining for adults 25 years and older. On the horizon for several of our states in the West are projections of as much as 155 percent increase (Nevada) in high school graduates by the year 2009. The construction of new college campuses is not among the solutions that states are considering for dealing with this growth. Instead, they are anticipating that emerging technologies will become more affordable, more interoperable, and

more readily available to students in urban, suburban, and rural areas. Higher education's challenge will be to adopt and adapt a hybrid of technologies to accommodate the range of services they will be expected to provide. Based on the New York test by Suite 12 and the University of Texas, LMDS in the 28 GHz Band promises to be an option that educational institutions, likely in partnership with commercial interests, could effectively utilize for instruction and service in another 5-10 years.

We are encouraged that the Commission is refining rules on the shared use of the 27.5 - 29.5 GHz band for both LMDS and FSS service that should include a strong educational use of that spectrum. We recommend a similar thorough consideration of educational uses in LMWS as the 40 GHz spectrum rules are developed. We agree with statements from several commenters suggesting further study is needed on the cost, technical interference issues, and efficiencies of various applications such as LMDS, LMWS, and experimental satellite services in the 40 GHz spectrum.

Education's main concern on these issues is ensuring our affordable access to emerging technologies. We have no rigid preference of one technology over another. Instead, we ask the Commission to consider how the limited available bandwidth can most efficiently be allocated to support a variety of needs and users in a way that will effectively include education's use of all these technologies.

Sincerely,

Sally M. Johnstone
Director

On behalf and with the approval of:

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